

1 THE HONORABLE JAMES L. ROBART
2
3
4
5
6
7

8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON -AT SEATTLE

10 USI INSURANCE SERVICES NATIONAL,
11 INC., formerly known as WELLS FARGO
12 INSURANCE SERVICES USA, INC., a
13 North Carolina corporation,

14 Plaintiff,

15 vs.

16 LOCKTON COMPANIES, LLC, a Missouri
17 limited liability company; LOCKTON
18 COMPANIES, LLC-PACIFIC SERIES, a
19 Missouri limited liability company;
20 NORTHEAST SERIES OF LOCKTON
21 COMPANIES, LLC, a Missouri limited
22 liability company; and SHIRLEY GORDON,
23 an individual,

24 Defendants.

25 Case No. 2:17-cv-01842-JLR

26 **STIPULATED MOTION OF
DISMISSAL WITHOUT PREJUDICE
AND PROPOSED ORDER**

JLR
NOTING DATE: FEBRUARY 22, 2018

STIPULATION

All the undersigned parties hereby stipulate to dismissal of this action under Rule 41(a)(1). Defendants Northeast Series of Lockton Companies, LLC, and Shirley Gordon are also named as Defendants in a parallel action entitled *USI Insurance Services National, Inc. v. Northeast Series of Lockton Companies, LLC, et al.*, Case No. 8:17-cv-02895-VMC-TGW (M.D. Fla.) ("Florida Litigation"). The Defendants have agreed to submit to the jurisdiction of

25 STIPULATION OF DISMISSAL WITHOUT
26 PREJUDICE (17-01842) - Page 1

FISHER & PHILLIPS LLP
1201 THIRD AVENUE, SUITE 2750
SEATTLE, WA 98101
(206) 682-2308

1 the United States District Court for the Middle District of Florida in the Florida Litigation for
2 purposes of adjudicating Plaintiff's claims relating to Shirley Gordon's employment at, and
3 departure from, her prior employment at Wells Fargo Insurance Services USA, Inc. and
4 employment at Northeast. Plaintiff USI Insurance Services National, Inc. (formerly known as
5 Wells Fargo Insurance Services USA, Inc.), has also agreed to dismiss the above-captioned
6 action, in its entirety, without prejudice.

7 Dated: February 21, 2018

8
9 /s Catharine M. Morisset
10 Catharine M. Morisset, WSBA #29682
Fisher & Phillips LLP
11 1201 Third Avenue, Suite 2750
Seattle, WA 98101
Tel.: (206) 682-2308
12 Fax: (206) 682-7908
13 E-Mail: emorisset@fisherphillips.com
mburnham@fisherphillips.com

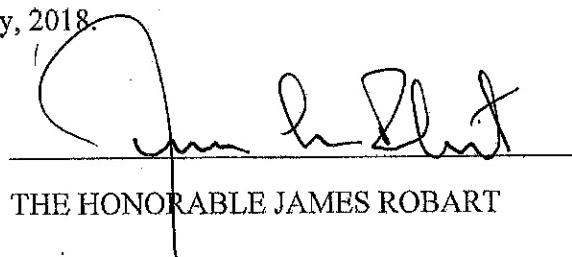
14 *Attorneys for Plaintiff USI Insurance
15 Services National, Inc.*

16
17 /s Todd Williams (per email authority)
18 Steven W. Fogg, WSBA #23528
Todd T. Williams, WSBA #45032
CORR CRONIN MICHAELSON
BAUMGARDNER FOGG & MOORE LLP
1001 Fourth Avenue, Suite 3900
Seattle, WA 98154
Phone: 206-274-8669
Fax: 206-625-0900
Email: sfogg@corrcronin.com
twilliams@corrcronin.com
19 *Attorneys for Defendants Lockton Companies,
LLC; Northeast Series of Lockton Companies,
LLC; and Lorraine Yumul Gant*

20 **ORDER**

21 Based on the foregoing Stipulation, it is hereby ORDERED that this action is dismissed
22 without prejudice.

23 Entered this 22nd day of February, 2018.
24

25
26 
THE HONORABLE JAMES ROBART

CERTIFICATE OF SERVICE

I hereby certify that on the date below written, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and caused to be served a true and correct copy of same by the method indicated below and addressed as follows:

Steven W. Fogg, WSBA #23528
Todd T. Williams, WSBA #45032
CORR CRONIN MICHAELSON
BAUMGARDNER FOGG & MOORE LLP
1001 Fourth Avenue, Suite 3900
Seattle, WA 98154
Phone: 206-274-8669
Fax: 206-625-0900
Email: sfogg@correronin.com
twilliams@correronin.com

Attorneys for Defendants

I declare under penalty of perjury under the laws of the United States of America that
the foregoing is true and correct. Executed on February 22, 2018, in accordance with 28 USC
1746.

Q.Malai

Jazmine Matautia

**STIPULATION OF DISMISSAL WITHOUT
PREJUDICE (17-01842) - Page 3**

FISHER & PHILLIPS LLP
1201 THIRD AVENUE, SUITE 2750
SEATTLE, WA 98101
(206) 682-2308